UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

Albert William Bleau, Jr.,

Plaintiff

:

vs. : Civil Action

No. 04-10469JLT (REK)

:

Greater Lynn Mental Health & Retardation Association, Inc.,

et al.,

:

Defendants

Motion Of Defendant Greater Lynn Mental Health & Retardation Association, Inc., For Partial Summary Judgment

Pursuant to Fed. R. Civ. P. 56 and Local Rule 56.1, defendant Greater Lynn Mental Health & Retardation Association, Inc., (Greater Lynn) moves for partial summary judgment in its favor as to so much of the remaining claims against Greater Lynn of plaintiff Albert William Bleau, Jr., (Mr. Bleau) that sound in tort for defamation on the ground that Mr. Bleau has not filed a more definite statement of the facts that, he alleges, establish that Greater Lynn defamed him, as the Court permitted and directed him to do. Concomitantly, Mr. Bleau has failed to proffer evidence in admissible form sufficient to support his defamation claim. See Fed. R. Civ. P. 56(c); Local Rule 56.1. In support

of its motion, Greater Lynn relies upon its accompanying memorandum and Local Rule 56.1 Concise Statement of Material Facts.

Request for Oral Argument

Believing that oral argument would be of assistance to the Court, Greater Lynn respectfully requests the opportunity to be heard.

by its attorneys,

s/ Garrick F. Cole

Garrick F. Cole BBO No. 091340 Christina Schenk-Hargrove BBO No. 645164

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Certificate of Service

I certify that a true and accurate copy of the above document was served upon each party of record or the party's counsel by first class mail, postage prepaid, this _____, day of _____, 200_.

s/ Garrick F. Cole

4 July 2005